

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION**

JOSE ACEVEDO, individually, and as
Special Administrator of the Estate of
JOEL ACEVEDO;

Plaintiff,

v.

MICHAEL MATTIOLI, et al.,

Defendants.

CASE NO. 23-cv-00489

JURY TRIAL DEMANDED

**PLAINTIFF’S MOTION IN LIMINE TO EXCLUDE
DR. JIMMIE L. VALENTINE AND DR. JEFFREY M. JENTZEN’S
EXPERT OPINIONS AND TESTIMONY DUE TO UNTIMELY
SERVICE OF DEFICIENT DISCLOSURES WITHOUT LEAVE OF COURT**

NOW COMES JOSE ACEVEDO, individually, and as special administrator of the ESTATE OF JOEL ACEVEDO, by and through his counsel, B’IVORY LAMARR, ESQUIRE, of the law firm of B’IVORY LAMARR TRIAL LAWYERS; DEVON M. JACOB, ESQUIRE, of the law firm of JACOB LITIGATION, INC.; and BENJAMIN L. CRUMP, ESQUIRE, of BEN CRUMP LAW, PLLC, and respectfully requests that the Court grant Plaintiff’s Motion In Limine to Exclude Dr. Jimmie L. Valentine and Dr. Jeffrey M. Jentzen’s Expert Opinions and Testimony Due to Untimely Service of

Deficient Disclosures Without Leave of Court. In support thereof, Plaintiff relies on the arguments as set forth in his Brief and the Exhibits filed in support of this Motion.

Undersigned counsel (Jacob) certifies that counsel for Mattioli does not concur in the filing of this motion.

WHEREFORE, it is respectfully requested that the Court grant Plaintiff's Motion In Limine to Exclude Dr. Jimmie L. Valentine and Dr. Jeffrey M. Jentzen's Expert Opinions and Testimony Due to Untimely Service of Deficient Disclosures Without Leave of Court.

Respectfully Submitted,

By: /s/ B'Ivory LaMarr

Date: August 22, 2025

B'IVORY LAMARR, ESQUIRE

Wisconsin Bar No. 1122469

blamarr@lamarrfirm.com

THE LAMARR FIRM

5718 Westheimer Road, Suite 1000, Houston, TX 77057

800.679.4600, Ext. 700

By: /s/ Devon M. Jacob

Date: August 22, 2025

DEVON M. JACOB, ESQUIRE

Pennsylvania Bar No. 89182

djacob@jacoblitigation.com

JACOB LITIGATION, INC.

P.O. Box 837, Mechanicsburg, Pa. 17055-0837

717.796.7733

KIRK M. CLAUNCH, ESQUIRE

Texas Bar No. 1039975

claunchlaw3@earthlink.net

THE CLAUNCH LAW FIRM

301 W. Central Avenue, Forth Worth, TX 76164

817.335.4003

BENJAMIN L. CRUMP, ESQUIRE

Washington, D.C. Bar No. 1552623

court@bencrump.com

PRECIOUS CHAVEZ, ESQUIRE

precious@bencrump.com

BEN CRUMP LAW, PLLC

122 S. Calhoun Street, Tallahassee, FL 32301

800.959.1444

Counsel for Plaintiff